



March 9, 2010

Human Services Committee Public Hearing

H. B. No. 5356 (RAISED) AN ACT CONCERNING PURCHASE OF SERVICE CONTRACTS

CCPA supports H.B. 5356 with its requirement that OPM is to provide recommendations for “improving uniformity of the policies and procedures of state agencies relating to purchase of service contracts.”

We have been pleased to work with the OPM Purchase of Service Unit for a number of years to achieve uniformity in state contract procedures. Examples of collaborative work between OPM and community providers include the uniform cost accounting standards and the master contract for the purchase of human services.

Our goal is for uniformity among the state agencies that contract for human services to maximize the ability of community providers to provide essential services while providing necessary compliance data in the most cost effective, efficient manner possible.

There is more work to be done to assure the timely development and implementation of uniform policies and procedures.

1. RFP, RFI, RFQ Posting

All state agencies are required to post “Request for Proposal” notices on the Department of Administrative Services website, eliminating the need for a would-be contractor to scour each and every state agency website for posts. This process is in effect for initial RFPs, but it does not appear to be utilized uniformly by the human services state agencies for updates to the RFP status or for posting of “Requests for Information” or “Requests for Quotation.” Instead, those community providers already contracting with a state agency may or may not receive notices of funding availability and other potential vendors will have no ability to track potential funding opportunities. Instead there are announcements issued separately from DMHAS, DCF and the Behavioral Health Partnership to current vendors, bypassing the DAS posting requirement.

Recommended language: All state agencies contracting for purchase of service contracts are required to post Requests for Proposal, Requests for Information and status updates to RFPs, RFIs and RFQs on the DAS website.

CCPA

35 Cold Springs Rd., Suite 522, Rocky Hill, CT 06067-3165
(P)860-257-7909 • (F)860-257-7777
www.ccpa-inc.org

CCPA Testimony: H. B. No. 5356 (RAISED) AN ACT CONCERNING PURCHASE OF SERVICE CONTRACTS

March 9, 2010 – page 2

2. Common RFP process

In FY09, the OPM Purchase of Service Unit led a project to develop a common RFP process. State agency contract managers and service providers participated in the development. At present, each state agency administers its own version of RFP, RFI or RFQ. For those providers seeking to contract with more than one state agency, completing these RFPs takes far more time than necessary. If there were common formats and requirements, it would be quicker and less costly to respond to RFPs and the state agencies could be more efficient in their candidate selection. This project appears to be moving very slowly.

Recommended language: Develop a common RFP process.

3. Uniform Contract Documents, Policies, Procedures and Personnel Documents

Each state agency utilizes its own contract application documents. Each state agency utilizes its own format for reporting on the budget for the service and each state agency has different requirements for reporting about the personnel working on the contract.

Contracting policies differ among the state agencies in such areas as shifting funds between line items, progress report formats and timelines, budget report formats and timelines.

Common formats, policies and procedures would result in more efficient service provision, with less time spent on administrative functions and more time allocated to direct services.

Recommended language: Develop a common contract documents.

4. Uniform Reporting Systems

POS contractors must report client and fiscal data using different systems for DMHAS, DCF, DDS, DSS and other contracting state agencies. DMHAS is set to unroll its own information data system's (DDaP) on July 1, 2010. DCF implemented the Programs and Services Data Collection and Reporting System (PSDCRS) in July of 2009. DSS and DDS have entirely different data reporting requirements.

And the line item fiscal reporting systems differ agency by agency in terms of data reported and in terms of software reporting tools.

Developing and utilizing one common data reporting system would be an efficient and effective way for community providers to comply with their contracts and for the state to monitor these contracts. The data system would need to incorporate client service data, quality data, financial and billing data. Some Electronic Medical Record systems offer this potential.

Recommendation: OPM develop a timeline for the development and implementation of uniform data reporting for client services, quality measures and financial information.

5. Licensing Protocols

DDS, DCF, DPH and DMHAS have different licensing requirements for many varied services. It would make fiscal sense to establish one overarching licensing protocol that would relate to all services that are licensed by the state, with sections that relate to the specific programs funded by individual state agencies.

There is some movement in this direction. 2009 legislation requires the integration of DMHAS and DSS licensing for substance abuse services.

Creating unified licensing would be a huge task because each state agency has contributed years of work in developing the licensing standards within its purview. Equally, the provider community has invested an extensive amount of time in working with the state agencies to develop the licensing standards and the interpretive guidelines and works every day to implement the licensing requirements. It would be very costly to overhaul and unify licensing, but in the long term, there would be greater system efficiency.

An alternative to licensing would be for the state to grant “deemed status” to agencies and programs accredited by the Joint Commission on the Accreditation of Health Care Organizations (JCAHO) or CARF the Rehabilitation Accreditation Commission. Deemed status would eliminate the need for or reduce the need for the extensive system of licensing inspection currently in practice.

Recommendation: OPM coordinate the development of uniform licensing requirements among human services contractors or evaluate the use of national accreditation standards in lieu of licensing.

